

U.S. ENVIRONMENTAL PROTECTION AGENCY
\$250,000 EMERGENCY ACTION MEMO

Date: September 25, 2009

Subject: Gibson Mercury Well Site
Camden, Benton County, Tennessee

From: Steve Spurlin, On-Scene Coordinator
Emergency Response and Removal Branch

To: Regional Response Center, 4WD-ERRB
Shane Hitchcock, Chief, ERRB
Jim Webster, Chief, Removal & Oil Section
Tennessee Department of Environment & Conservation

I. PURPOSE

The purpose of this document is to document the decision to initiate emergency response actions described herein for the Gibson Mercury Well Site located in Camden, Benton County, Tennessee, under the On-Scene Coordinators (OSC) \$250,000 authority.

II. BACKGROUND

Site No: B429

TO Amount: \$30,000

Contractor: WRS Compass

CERCLIS No: TNN000410471

Response Authority: CERCLA

State Notification: 09/17/09

Demobilization Date: TBD

NPL Status: Non-NPL

Start Date: 09/17/09

Completion Date: TBD

III. SITE INFORMATION

- A. Incident Category:** (check one)
- ☐ Active Production Facility
 - ☐ Inactive Production Facility
 - ☐ Active Waste Management Facility
 - ☐ Inactive Waste Management Facility
 - ☐ Midnight Dump
 - ☐ Transportation Related
 - ☒ Other (residential well)

B. Site Location

1. Site description

a. Removal site evaluation

On February 3, 2009, the Tennessee Department of Environment and Conservation (TDEC) received a complaint from [REDACTED] of 1290 Old Highway 70 East in Camden, Tennessee concerning the quality of the water from [REDACTED] well. TDEC staff visited [REDACTED] on February 12, 2009 and returned on February 25, 2009 to collect a sample from [REDACTED] well. On March 13, 2009 TDEC received the results of the analysis. Mercury was found at 11 parts per billion (ppb). The Maximum Contaminant Level for Mercury in drinking water is 2 ppb. TDEC re-sampled [REDACTED] well on March 13, 2009 and expanded the investigation to include a nearby neighbor. The sample results from the second sample at [REDACTED] well was 13 ppb. Mercury was not found in the well samples collected by TDEC at surrounding properties.

Based on TDEC's previous sampling, EPA decided to conduct sampling of the Gibson well. On July 21, 2009, EPA sampled the well. Results indicated a mercury concentration of 6.8 ppb. TDEC has provided the resident bottled water for drinking and cooking in the short term.

Based on the site conditions, the OSC utilized his warrant authority to hire Emergency Response & Remediation Services (ERRS) contractor, WRS Compass, to conduct an emergency response consisting of providing a service line connection from the city supply line to the house.

b. Physical location and Site characteristics

The Gibson well site is located at 1290 Old Highway 70 East in Camden, Tennessee. The wellhead is located approximately 50 yards north of the residence at coordinates 36.04018 North and 88.07719 West.

c. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Mercury, a hazardous substance, was detected in the private drinking water well. The well services a primary residence, currently occupied, and a house trailer on the same property used as a rental property. The trailer is not currently occupied.

d. Maps, pictures, and other graphic representations

Maps, pictures, and other graphic representations can be made available upon request, or site information can be found at www.epaossc.org/GibsonMercuryWell.

2. Description of threat

Explanations of how this release or threat of release meets the criteria for threats to public health or welfare or the environment in section 300.415 (b)(2) of the NCP are discussed below.

a. 300.415(b)(2)(i) "Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants"

On February 3, 2009, the Tennessee Department of Environment and Conservation (TDEC) received a complaint from [REDACTED] of 1290 Old Highway 70 East in Camden, Tennessee concerning the quality of the water from [REDACTED] well. [REDACTED] reported experiencing unexplained health effects, including burning skin after bathing. TDEC staff visited [REDACTED] on February 12, 2009 and returned on February 25, 2009 to collect a sample from [REDACTED] well. On March 13, 2009 TDEC received the results of the analysis. Mercury was found at 11 parts per billion (ppb). TDEC re-sampled the well in March 2009. The sample results for mercury from the second sample at [REDACTED] well was 13 ppb. On July 21, 2009, EPA sampled the well. The EPA result indicated a mercury concentration of 6.8 ppb.

The maximum contaminant level (mcl) for mercury in drinking water is 2 ppb. The mcl is the maximum allowable contaminant level for drinking water established by EPA to ensure no short or long-term health effects. Mercury occurs in the environment from both natural sources as well as industrial sources. Exposure to mercury may cause damage to the brain and kidneys as well as harm a developing fetus.

IV. RESPONSE INFORMATION

A. Situation

1. Current situation

EPA OSC Spurlin initiated an emergency removal action on September 17, 2009. EPA hired ERRS contractor, WRS Compass, to subcontract a contractor to install the service line. The work is ongoing, but anticipated to be completed by September 30, 2009.

2. Removal activities to date

a. Federal Government/Private Party

EPA OSC Spurlin initiated an emergency removal action on September 17, 2009. EPA hired ERRS contractor, WRS Compass, to subcontract a contractor to install the service line.

3. Enforcement¹

¹ Enforcement strategy is not part of the Action Memo for purposes of NCP

An EPA Region 4 attorney may be assigned to investigate any potential enforcement actions; however, no source of the contamination has been identified.

B. Planned Removal Actions

1. Proposed action description

The specific task involved in the response to the threat will be to subcontract with a local contractor to install a service line from the City of Camden main water supply line to the home. The service line will be split on the property to provide water to primary home and the trailer.

2. Contribution to remedial performance

The proposed actions will, to the extent practicable, contribute to the efficient performance of any long-term remedial action at the site.

3. Description of Alternative Technologies

N/A

4. ARARs

There are no Federal ARARs identified for the site as the action involves the installation of a service line to provide safe drinking water to the residents.

5. Project schedule

The emergency action was initiated on September 17, 2009, and the project is anticipated to be completed by September 30, 2009.

V. COSTS

Extramural Costs:

	<u>Ceiling</u>	<u>To Date</u>
ERRS/USES	\$50,000	\$10,000

consistency.

START	\$20,000	\$7000
<u>Intramural Costs:</u>		
EPA-Direct	\$2000	\$800
EPA-Indirect	\$3000	\$1200
TOTAL PROJECT CEILING	\$75,000	

The Project Ceiling has been approved by the OSC as documented in this Action Memo/ Initial Pollution Report. The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor. Other financial data, which the OSC must rely upon, may not be entirely up to date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Direct costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

VI. DISPOSITION OF WASTES

No waste disposal was undertaken as part of the EPA emergency removal action.

VII. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response action selected in this Action Memorandum, present an imminent and substantial endangerment to public health, welfare, or the environment.

VIII. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at this Site would increase the actual or potential threats to the public and the environment. The residents continue to have no long-term provision for safe water for multi-purpose use (ie. drinking, bathing, cooking) until the actions discussed in this memorandum are completed.

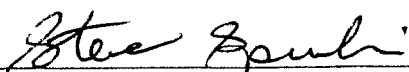
IX. OUTSTANDING POLICY ISSUES

NONE

X. APPROVAL

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site meet the NCP section 300.415(b)(2) criteria for a removal and through this document, I am approving the proposed removal actions. The total project ceiling is \$75,000, of which, \$50,000 will be funded from the Regional removal allowance.



Steve Spurlin
Federal On-Scene Coordinator

9/25/09
Date